

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

F / L E D
APR 26 2023
U.S. DISTRICT COURT
BAY CITY, MICHIGAN

UNITED STATES OF AMERICA,
Plaintiff,

v.

1:22-cr-20670-TLL-PTM

ANTHONY DEMASI,
Defendant.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**Bank Fraud
(18 U.S.C. § 1344(1))**

That from on or about January 4, 2018, up to and including July 3, 2018, said dates being approximate, in the Eastern District of Michigan, Anthony Demasi, defendant herein, knowingly executed a scheme and artifice to defraud Barclays Bank Delaware, commonly called “Barclays,” a “financial institution” as defined in Title 18, United States Code § 20, with the intent to deceive said bank and to obtain money, funds and credit owned by or under the custody or control of Barclays Bank Delaware, an insured depository institution as defined in Section

3(c)(2) of the Federal Deposit Insurance Act by means of material false or fraudulent representations.

It was part of the scheme and artifice that the defendant submitted a credit card application containing fraudulent material representations, to wit: fraudulently applying for a credit card in the name of a third party and using without lawful authority the personal identification information of an unwitting third party to include: name, date of birth and Social Security Number for defendant Demasi's personal financial gain.

On or about January 4, 2018, in the Eastern District of Michigan, defendant Anthony Demasi executed the scheme and artifice as set forth above, in that the defendant submitted to Barclays Bank Delaware a false credit card application containing the following fraudulent material representations: using without legal authority the name, date of birth and Social Security Number of unwitting PERSON A, for the purpose of obtaining credit and money from Barclays Bank Delaware, an FDIC-insured financial institution, in violation of Title 18, United States Code, Section 1344(1).

COUNT TWO
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

On or about January 4, 2018, in the Eastern District of Michigan, Anthony Demasi, defendant herein, did knowingly use, without lawful authority, a means of

identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(5), to wit: Bank Fraud in violation of Title 18, United States Code § 1344, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE
Bank Fraud
(18 U.S.C. § 1344(1))

That from on or about March 6, 2018, up to and including May, 2018, said dates being approximate, in the Eastern District of Michigan, Anthony Demasi, defendant herein, knowingly executed a scheme and artifice to defraud JP Morgan Chase Bank NA, commonly called “Chase Bank,” a “financial institution” as defined in Title 18, United States Code § 20, with the intent to deceive said bank and to obtain money, funds and credit owned by or under the custody or control of JP Morgan Chase Bank NA, an insured depository institution as defined in Section 3(c)(2) of the Federal Deposit Insurance Act by means of material false or fraudulent representations.

It was part of the scheme and artifice that the defendant submitted a credit card application containing fraudulent material representations, to wit: fraudulently applying for a credit card in the name of a third party and using without lawful authority the personal identification information of an unwitting third party to

include: name, date of birth and Social Security Number for defendant Demasi's personal financial gain.

On or about March 6, 2018, in the Eastern District of Michigan, defendant Anthony Demasi executed the scheme and artifice as set forth above, in that the defendant submitted to JP Morgan Chase Bank NA a false credit card application containing the following fraudulent material representations: using without legal authority the name, date of birth and Social Security Number of unwitting PERSON B, for the purpose of obtaining credit and money from JP Morgan Chase Bank NA, an FDIC-insured financial institution, in violation of Title 18, United States Code, Section 1344(1).

COUNT FOUR
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

On or about March 6, 2018, in the Eastern District of Michigan, Anthony Demasi, defendant herein, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(5), to wit: Bank Fraud in violation of Title 18, United States Code § 1344, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT FIVE
Bank Fraud
(18 U.S.C. § 1344(1))

That from on or about August 31, 2018, up to and including December 4, 2018, said dates being approximate, in the Eastern District of Michigan, Anthony Demasi, defendant herein, knowingly executed a scheme and artifice to defraud Capital One Bank NA, commonly called “Capital One,” a “financial institution” as defined in Title 18, United States Code § 20, with the intent to deceive said bank and to obtain money, funds and credit owned by or under the custody or control of Capital One Bank NA, an insured depository institution as defined in Section 3(c)(2) of the Federal Deposit Insurance Act by means of material false or fraudulent representations.

It was part of the scheme and artifice that the defendant submitted a credit card application containing fraudulent material representations, to wit: fraudulently applying for a credit card in the name of a third party and using without lawful authority the personal identification information of an unwitting third party to include: name, date of birth and Social Security Number for defendant Demasi’s personal financial gain.

On or about August 31, 2018, in the Eastern District of Michigan, defendant Anthony Demasi executed the scheme and artifice as set forth above, in that the defendant submitted to Capital One Bank NA a false credit card application

containing the following fraudulent material representations: using without legal authority the name, date of birth and Social Security Number of unwitting PERSON C, for the purpose of obtaining credit and money from Capital One Bank NA, an FDIC-insured financial institution, in violation of Title 18, United States Code, Section 1344(1).

COUNT SIX
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

On or about August 31, 2018, in the Eastern District of Michigan, Anthony Demasi, defendant herein, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(5), to wit: Bank Fraud in violation of Title 18, United States Code § 1344, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

THIS IS A TRUE BILL.

DATED: April 26, 2023

s/Grand Jury Foreperson

GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/Anthony P. Vance

ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices

s/J. Michael Buckley

J. MICHAEL BUCKLEY
Assistant United States Attorney
Deputy Chief, Branch Office

Companion Case information MUST be completed by AUSA and initialedUnited States District Court
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case InformationThis may be a companion case based upon LCrR 57.10 (b)(4)¹: Yes No

1:22-cr-20670-TLL-PTM

Case Title: USA v. Anthony Demasi**County where offense occurred:** Isabella**Check One:** Felony Misdemeanor Petty Indictment/ Information --- no prior complaint. Indictment/ Information --- based upon prior complaint [Case number:] Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

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 APR 26 2023
 U.S. DISTRICT COURT
 BAY CITY, MICHIGAN
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Superseding Case Information**Superseding to Case No:** 22-cr-20670**Judge:** Thomas L. Ludington

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

s/J. Michael Buckley

Date: April 26, 2023

J. Michael Buckley
 Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.